

## REMARKS/ARGUMENTS

Claims 1-57 are pending in the application. Objection is made to misnumbered claims, and claims 1-57 stand rejected as obvious under 35 U.S.C. § 103. The rejection is respectfully traversed and reconsideration is requested. The references asserted do not teach or suggest the claimed invention.

### *Claim Amendments*

The amendment of independent method claim 1 and independent system claim 32 proposes that the financial services information is displayed on the display screen of the terminal for the visually impaired user (1) with all controls in the financial services information displayed exclusively in text readable by the screen reading device and (2) with the displayed text arranged to be readable by the screen reading device in a pre-defined rational sequence for the visually impaired user in either or both of a top to bottom sequence and a left to right sequence on the display screen to make semantic sense when read by the screen reading device for the visually impaired user.

Claims 11-13, 42 (misabeled 41), and 43 (misabeled 42) are canceled, and claims 36-41 (misabeled 37-40) and 44-57 (misabeled 43-56) are amended to address editorial issues resulting from the amendment of claims 1 and 32.

Support for the foregoing amendment is found throughout the specification and in the claims as detailed above. Accordingly, no new matter has been added.

### *Claim Objections*

### *Claim Rejections - 35 U.S.C. § 103*

Claims 1, 2, 6, 11, 27-33, 37, 42 and 57 stand rejected under 35 U.S.C. § 103(a) as obvious over Crandall, Jr. (U.S. Patent No. 6,186,396) in view of Barthel, American Banker; and claims 3-5, 7-10, 12-26, 34-36, 38-41, and 43-56 stand

rejected under 35 U.S.C. § 103(a) as obvious over Crandall, Jr. in view of Barthel, American Banker and in view of Covert et al. (U.S. Patent No. 6,334,117).

The Examiner considers that Crandall, Jr. teaches every element of independent claims 1 and 32 except providing a single and consistent navigation scheme for the user to navigate the displayed financial services information, which the examiner considers to be taught by Barthel, American Banker.

It is respectfully submitted that Crandall, Jr. and/or Barthel, American Banker do not disclose or suggest Applicants' claimed invention either separately or in combination with one another. It is true that Crandall, Jr. discloses a terminal (i.e., an ATM) for delivering financial services information to a visually impaired user. However, Crandall, Jr. focuses on equipping and pre-programming the ATM to send infrared messages in synthesized speech equivalence format to a portable receiver provided to the visually impaired user that leads the visually impaired user to the location of the ATM. See, e.g., Abstract, Col. 1, lines 28-32, and Col. 8, lines 13-20. The ATM of Crandall, Jr. can also be pre-programmed to send messages on request to the visually impaired person's portable receiver, such as how to use the ATM (see, e.g., Col. 3, lines 50-61) and how to operate and locate customer interfaces and to provide feedback on transactions, such as whether the correct PIN was entered or correct menu and keys were selected. See, e.g., Col. 4, line 61-Col. 5, line 20.

However, the ATM terminal is referred to in Crandall, Jr. as the "widely-used, highly popular method of conducting monetary transactions" (see, e.g., Col. 1, lines 60-61), and the modifications proposed by Crandall, Jr. relate to programming the ATM to send infrared messages to the user's receiver informing the user where the ATM is located and how to find and operate the ATM and to provide feedback on the nature and/or completion of the transaction, such as whether the proper PIN was entered and that subsequent entries are operating under the desired menus, whether the amount of cash withdrawal exceeds the account balance and what account balance is available and what to do about it. See, e.g., Col. 4, line 61-Col. 5, line 20. There is absolutely

nothing in Crandall, Jr. to suggest displaying the information in any manner other than the way it is typically presented on the screens of “widely-used, highly popular” ATMs, e.g., with a mixture of graphics and text which is confusingly difficult, if not impossible, for the screen reader to read for a visually impaired user. Likewise, there is absolutely nothing in Crandall, Jr. to suggest that the displayed text is arranged in any way other than the way in which it is typically arranged on such widely-used and highly popular ATM screens, e.g., with labels above input or selection fields, which is confusing and misleading when read by the screen reader for the visually impaired user. Thus, there is no suggestion in Crandall, Jr. to display the financial services information on the terminal screen with all controls in the financial services information exclusively in text readable by a screen reading device according to Applicants’ claimed invention. Nor is there any suggestion in Crandall, Jr. to arrange the displayed text to be readable by the screen reading device in a pre-defined rational sequence for the visually impaired user in one or both of a top to bottom sequence and a left to right sequence on the display screen to make semantic sense when read by the screen reading device according to Applicants’ claimed invention.

Barthel, American Banker does not remedy the deficiencies of Crandall, Jr. On the contrary, Barthel merely reports that ATM manufacturers have developed software that leads visually impaired users through the steps of a transaction by giving the location of keys and confirming what action was taken and suggests that the best answer to complying with ADA seems to be a voice synthesizer that allows the ATM to ‘speak’ to blind customers. That is no more than what Crandall, Jr. proposes. There is no description of the ‘software’ mentioned in Barthel and nothing in Barthel to suggest displaying the information on the screen in any manner other than the way it is typically presented on ATM screens with the mixture of graphics and text that is so confusing to a visually impaired user when read by a screen reader, and there is nothing in Barthel to suggest arranging the displayed text in any way other than the way in which it is typically arranged on ATM screens with the labels above input or selection fields that is both confusing and misleading to the visually

impaired user when read by the screen reader. Thus, there is no suggestion in Crandall, Jr. and/or Barthel to display the financial services information on the terminal screen with all controls in the financial services information exclusively in text readable by a screen reading device according to Applicants' claimed invention. Nor is there any suggestion in Crandall, Jr. and/or Barthel to arrange the displayed text to be readable by the screen reading device in a pre-defined rational sequence for the visually impaired user in one or both of a top to bottom sequence and a left to right sequence on the display screen to make semantic sense when read by the screen reading device according to Applicants' claimed invention.

Nor do Covert et al. remedy the deficiencies of Crandall, Jr. and/or Barthel. It is true that Covert et al. disclose a terminal (i.e., an ATM terminal) coupled to a server. However, the ATM is referred to in Covert et al. as a "well known", "common type" of ATM (see, e.g., Col. 1, lines 25-28) that is utilized in an ATM system with a host server coupled over the Internet to one or more foreign servers. Covert et al. simply teaches a known ATM terminal that connects to and through a host processor (analogous to an ISP) as a gateway through which all the various ATM networks become available to a cardholder, regardless of where the cardholder banks. See, e.g., Abstract and Col. 4, line 55-Col. 5, line 15. There is likewise nothing in Covert et al. to suggest that information is displayed on the ATM screen in any manner other than the way it is typically presented on "well known", "common type" ATMs with the mixture of graphics and text that is highly confusing to a visually impaired user when read by a screen reader, and there is nothing in Covert et al. to suggest arranging the displayed text in any way other than the way in which it is typically arranged on ATM screens with the labels above input or selection fields that is both so confusing and misleading to the visually impaired user when read by the screen reader. Thus, there is no suggestion in Crandall, Jr., and/or Barthel, and/or Covert et al. to display the financial services information on the terminal screen with all controls in the financial services information exclusively in text readable by a screen reading device according to Applicants' claimed invention. Nor is there any

suggestion in Crandall, Jr. and/or Barthel and/or Covert et al. to arrange the displayed text to be readable by the screen reading device in a pre-defined rational sequence for the visually impaired user in one or both of a top to bottom sequence and a left to right sequence on the display screen to make semantic sense when read by the screen reading device according to Applicants' claimed invention.

Therefore, Crandall, Jr. and/or Barthel, and/or Covert et al. do not disclose, nor even suggest, the required combination of limitations of independent claims 1 and 32 of applicant's claimed method and system for delivering financial services information to a visually impaired user at a terminal with a screen reading device in which the financial services information is displayed on the display screen of the terminal for the visually impaired user with all controls in the financial services information displayed exclusively in text readable by the screen reading device and with the displayed text arranged to be readable by the screen reading device in a pre-defined rational sequence for the visually impaired user in either or both of a top to bottom sequence and a left to right sequence on the display screen to make semantic sense when read by the screen reading device for the visually impaired user. On the contrary, it is believed that the Examiner inadvertently allowed improper hindsight to intrude into the analysis by reading the Applicants' own teachings into the prior art.

The claimed combinations are not taught or suggested by Crandall, Jr. and/or Barthel, and/or Covert et al. either separately or in combination with one another. Because the cited references, either alone or in combination, do not teach the limitations of independent claims 1 and 32, the Examiner has failed to establish the required *prima facie* case of unpatentability. See In re Royka, 490 F.2d 981, 985 (C.C.P.A., 1974) (holding that a *prima facie* case of obviousness requires the references to teach all of the limitations of the rejected claim); See also MPEP §2143.03.

The Examiner has failed to establish the required *prima facie* case of unpatentability for independent claims 1 and 32 and similarly has failed to establish a

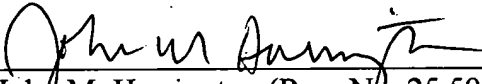
*prima facie* case of unpatentability for claims 2-10 and 14-31 that depend on claim 1 and claims 33-41 and 44-57 that depend on claim 32 and which recite further specific elements that have no reasonable correspondence with the references.

### Conclusion

In view of the foregoing amendment and these remarks, each of the claims remaining in the application is in condition for immediate allowance. Accordingly, the examiner is requested to reconsider and withdraw the rejection and to pass the application to issue. The examiner is respectfully invited to telephone the undersigned at (336) 607-7318 to discuss any questions relating to the application.

Respectfully submitted,

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